

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDWARD ROBERT LICHWICK, JR.,

Plaintiff,

- against -

VERIZON,

Defendant.

08 CIV 3892 (SCR)
(ECF)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendant Verizon Pennsylvania's (improperly pled and named as Verizon), Motion to Dismiss the Complaint; the Declaration of Colleen E. Nelson, sworn to on July 7, 2008, the Declaration of Vicki R Walcott-Edim, sworn to on July 7, 2008, and the exhibit annexed thereto; and on all prior proceedings and matters of record in this case, Defendant Verizon Pennsylvania, Inc., by and through its undersigned counsel, will move this Court, before the Honorable Stephen C. Robinson, United States District Judge, United States District Courthouse, 300 Quarropas Street, Room 633, White Plains, New York 10601, and at such time as the Court shall direct for an order pursuant to Federal Rule of Civil Procedure 12(b)(1), (2), (3), and (6) dismissing the claims set forth in the Complaint.

Dated: New York, New York
July 7, 2008

Respectfully submitted,

JONES DAY

/s/ Vicki R. Walcott-Edim
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pro hac vice pending

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2008, the foregoing document was filed with the Clerk of the Court and served via overnight delivery in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties:

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